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April 26, 2022

FILED BY ECF

The Honorable Vernon S. Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED *Vern Bro*
VERNON S. BRODERICK
U.S.D.J. 05/20/22

Re: United States v. Confesor, 20-CR-00059-VSB

Dear Judge Broderick:

I am appointed counsel under the Criminal Justice Act for Mr. Minaya-Rodriguez in the case referenced above and respectfully submit this letter on his behalf to request a modification of his bail to downgrade Mr. Minaya-Rodriguez's curfew to stand-alone GPS monitoring.

Mr. Minaya-Rodriguez has been released on bail since March 24, 2020. On February 11, 2021, this Court ordered that defendant Daisy Confesor's bail be modified to remove the conditions of curfew and GPS monitoring. On April 26, 2021, we sought the same for Mr. Minaya-Rodriguez. This application was granted in part and denied in part on May 5, 2021, when this Court ordered that Mr. Minaya-Rodriguez be granted a curfew while remaining subject to continued GPS monitoring. Since then, Mr. Minaya-Rodriguez has continued to fully comply with each of his bail conditions.

Accordingly, we respectfully request that the Court modify Mr. Minaya-Rodriguez's bail conditions to downgrade Mr. Minaya-Rodriguez's curfew to stand-alone GPS monitoring. I have conferred with AUSA Juliana Murray, AUSA Elizabeth Espinosa and Mr. Jonathan Lettieri of Pretrial Services, who have consented to this request to downgrade Mr. Minaya-Rodriguez's curfew to stand-alone GPS monitoring.

Thank you for the Court's attention and consideration of this request.

Respectfully submitted,

/s/ Victor L. Hou

Victor L. Hou

cc: Juliana Murray, Esq., AUSA
Elizabeth Espinosa, Esq., AUSA
Jonathan Lettieri, Supervising Officer, PTS